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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHAD LEROY STONE,

Defendant.

Case No. CR-22-93-BLG-SPW

**DEFENDANT'S UNOPPOSED
MOTION TO CONTINUE
TRIAL**

COMES NOW Defendant CHAD LEROY STONE, by and through his counsel of record, the FEDERAL DEFENDERS OF MONTANA and EVANGELO ARVANETES, Assistant Federal Defender, and moves the Court for an order continuing the trial currently scheduled for January 17, 2023, at 9:00 a.m., and for an order extending the pretrial deadlines accordingly.

The grounds for this motion are as follows:

1. Additional time is needed to investigate the circumstances of the alleged offense in order to prepare for trial.

2. Undersigned counsel respectfully requests the trial be reset for a time setting on or about Monday, March 20, 2023.

3. For these reasons, Mr. Stone requests the Court to continue the trial of this matter. Such a continuance will allow for an adequate opportunity to explore relevant issues and prepare this case for trial. Further it will prejudice the Mr. Stone if this continuance is not granted. Undersigned counsel for Mr. Stone asserts that the ends of justice served by granting of such continuance outweigh the best interest of the public and the Mr. Stone in a speedy trial. Mr. Stone further asserts that for purposes of the speedy trial act, the number of days which this matter is continued are excludible under 18 U.S.C. §3161(h)(A)(B)(iv).

4. Mr. Stone is not currently in custody and resides in Emigrant, Montana.

5. Undersigned Counsel has contacted Thomas Godfrey of the United States Attorney's Office regarding this continuance, and he has no objection to this Motion.

RESPECTFULLY SUBMITTED this 19th day of December, 2022.

/s/ Evangelo Arvanetes

EVANGELO ARVANETES
Federal Defenders of Montana
Counsel for Defendant

/s/ Russell A. Hart

RUSSELL A. HART
Federal Defenders of Montana
Counsel for Defendant

CERTIFICATE OF SERVICE
L.R. 5.2(b)

I hereby certify that on December 19, 2022, a copy of the foregoing document was served on the following persons by the following means:

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<u> </u>	E-Mail

1. CLERK, UNITED STATES DISTRICT COURT

2. THOMAS GODFREY
Assistant United States Attorney
United States Attorney's Office
2601 2nd Avenue North
Billings, MT 59101
Counsel for the United States

3. CHAD LEROY STONE
Defendant

/s/ Evangelo Arvanetes
EVANGELO ARVANETES
Federal Defenders of Montana
Counsel for Defendant

/s/ Russell A. Hart
RUSSELL A. HART
Federal Defenders of Montana
Counsel for Defendant